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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO NINETY-SEVENTH  
THROUGH NINETY-EIGHTH OMNIBUS  
OBJECTIONS TO CLAIMS AND REQUEST  
FOR ORDERS BY DEFAULT AS TO  
UNOPPOSED OBJECTIONS**

**[Re: Dkt. Nos. 10933 and 10937]**

**Regarding Objections Set for Hearing  
August 25, 2021, at 10:00 a.m. (Pacific Time)**

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Docket Number	Omnibus Objection
10933	<i>Reorganized Debtors’ Ninety-Seventh Omnibus Objection to Claims (Books and Records Claims / Satisfied Claims / No Liability Claims)</i> (the “ <b>Ninety-Seventh Omnibus Objection</b> ”)
10937	<i>Reorganized Debtors’ Ninety-Eighth Omnibus Objection to Claims (Passthrough Claims)</i> (the “ <b>Ninety-Eighth Omnibus Objection</b> ”)

The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced amounts the Proofs of Claim listed in Exhibits 1-3 to the Ninety-Seventh Omnibus Objection and Exhibits 1A and 1B to the Ninety-Eighth Omnibus Objection.

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 10935 and 10940]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 10934 and 10938] and Renee Records [Docket No. 10939]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Sonia Akter*, filed on July 22, 2021 [Docket No. 10969], each holder of a claim listed on Exhibits 1-3 to the Ninety-Seventh Omnibus Objection and Exhibits 1A and 1B to the Ninety-Eighth Omnibus Objection received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with

1 respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount, and,  
2 if applicable (ii) the claim number, claim amount and priority of the surviving claim for each  
3 counterparty.

4 The deadline to file responses or oppositions to the Omnibus Objections has passed. The  
5 Reorganized Debtors have not received any formal or informal responses.

6 **DECLARATION OF NO OPPOSITION RECEIVED**

7 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

8 1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the  
9 Reorganized Debtors.

10 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no  
11 responses have been filed with respect to the Omnibus Objections except as described herein.

12 3. This declaration was executed in Sunnyvale, California.

13 WHEREFORE, the Reorganized Debtors hereby request entry of Orders disallowing and/or  
14 expunging the Proofs of Claim listed in **Exhibit 1** to this Request, which listed Claims are identical to  
15 those listed in Exhibits 1-3 to the Ninety-Seventh Omnibus Objection and Exhibits 1A and 1B to the  
16 Ninety-Eighth Omnibus Objection.

17  
18 Dated: August 18, 2021

**KELLER BENVENUTTI KIM LLP**

19 By: /s/ Thomas B. Rupp  
20 Thomas B. Rupp

21 *Attorneys for Debtors and Reorganized Debtors*  
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